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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

PORTLAND COMMUNITY COLLEGE,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
VETERANS AFFAIRS; DENIS
MCDONOUGH, in his official capacity as
Secretary of the United States Department
of Veterans Affairs,

Defendants.

Case No. 1:21-cv-01700-CL

DECLARATION OF STACEY A.
MARTINSON IN SUPPORT OF
PLAINTIFF'S MOTION TO COMPEL
SUPPLEMENTAL PRODUCTION OF THE
VA'S ADMINISTRATIVE RECORD

I, Stacey A. Martinson, hereby declare and state as follows:

1. I am a partner with the law firm of Miller Nash LLP, and one of the attorneys representing Portland Community College (“PCC”) in the above case. I make this declaration in support of PCC’s Motion to Compel Supplemental Production of the VA’s Administrative Record (the “Motion”). I have personal knowledge of the facts set forth in this declaration.

2. Prior to filing PCC’s Motion, PCC and the United States Department of Veterans Affairs (the “VA”) conferred over PCC’s concerns with the substance and scope of the VA’s administrative record. The parties plan to continue to confer and will promptly inform the Court in the event that the parties can reach an agreement or resolution.

3. Attached as **Exhibit 1** is a true and correct copy of a webpage located at [Information About GI Bill Overpayments and Debts - Education and Training \(va.gov\)](https://www.va.gov/education/overpayments-debts/) (last accessed on March 4, 2024) that describes Student Debt.

4. Attached as **Exhibit 2** is a true and correct copy of a VA PowerPoint presentation dated March 2018.

5. Attached as **Exhibit 3** is a true and correct copy of a letter from the VA dated November 15, 2021.

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6. Attached as **Exhibit 4** is a true and correct copy of a letter from the VA dated May 3, 2023.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

EXECUTED this 4th day of March 2024.

/s/ Stacey A. Martinson

Stacey A. Martinson